

# **EXHIBIT F**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LINDA J. BLOZIS,	)	
	)	
Plaintiff,	)	
	)	Civil Action
v.	)	No. 05-891 (SLR)
	)	
MELLON TRUST OF DELAWARE,	)	
NATIONAL ASSOCIATION; MELLON	)	
BANK, NATIONAL ASSOCIATION;	)	
MELLON FINANCIAL CORPORATION,	)	
	)	
Defendants.	)	

Deposition of LINDA J. BLOZIS taken pursuant to notice at the Law Office of John M. LaRosa, Two East 7th Street, Suite 302, Wilmington, Delaware, beginning at 10:05 a.m., on Wednesday, July 26, 2006, before Kurt A. Fetzer, Registered Diplomate Reporter and Notary Public.

APPEARANCES:

JOHN M. LaROSA, ESQ.  
LAW OFFICE OF JOHN M. LaROSA  
Two East 7th Street - Suite 302  
Wilmington, Delaware 19801  
For the Plaintiff

STEPHANIE WILSON, ESQ.  
REED SMITH LLP  
Princeton Forrestal Village  
136 Main Street - Suite 250  
Princeton, New Jersey 08543-7839  
For the Defendant

WILCOX & FETZER  
1330 King Street - Wilmington, Delaware 19801  
(302) 655-0477  
www.wilfet.com



WILCOX & FETZER LTD.  
Registered Professional Reporters

ORIGINAL

1 A. As best as I can remember, about the mid to,  
2 midnineties to that time.

3 Q. And that team was headed up by Brendan Gilmore,  
4 the Delaware team?

5 A. Yes.

6 Q. Now, with respect to your duties, you were in  
7 private banking?

8 A. No.

9 Q. What was the name, what was the name of the  
10 team?

11 A. As best as I recall at that time Mellon started  
12 to call the trust teams private asset management  
13 teams.

14 Q. Now, I want to get a sense of the Delaware team  
15 and it appears based on your time frame that you were  
16 still at the 10th and Market location around that time  
17 that it went to the team concept.

18 Does that sound accurate?

19 A. That's your question?

20 Q. Yes.

21 A. Yes.

22 Q. I want to get a sense of who consisted of the  
23 Delaware team. You obviously?

24 A. (The witness nodded.)



1 Q. Who else was on the team?

2 A. At that time?

3 Q. Yes.

4 A. Bob, Robert H. Bell was the senior trust  
5 officer. Linda Squier was a trust officer. Kathleen  
6 Agne was an assistant and I was an assistant.

7 Q. And at the top would have been Brendan?

8 A. Top of?

9 Q. The top of, sort of the top of the team?

10 A. Those people reported to Brendan Gilmore.

11 Q. Do you know who Brendan Gilmore reported to  
12 around the '97-98 time frame?

13 A. It would have been the senior regional officer  
14 in Philadelphia.

15 Q. Do you know who that was?

16 A. At this time I don't recall the name.

17 Q. Was Brendan Gilmore's office at the 10th and  
18 Market location?

19 A. No.

20 Q. Do you know where his office was?

21 A. At the Mellon building, office building in  
22 Philadelphia on Market Street.

23 Q. You said, Ms. Blozis, that at some point in  
24 time your title changed to portfolio administrator.



1 are some examples that might help you with the  
2 question.

3 A. To the best of my memory, Mellon changed their  
4 structuring, their job titles and the structuring.

5 Q. And as a result your job title changed?

6 A. Yes.

7 Q. With respect to the trust specialist position,  
8 you identified a number of people that was on I guess  
9 the private asset management team for Delaware and  
10 those were Robert Bell, Linda Squier, Kathleen Agne  
11 and yourself?

12 A. Is that your question?

13 Q. Yes.

14 A. Yes.

15 Q. And when you became portfolio administrator  
16 around the 1999 time frame, was that still the team?

17 A. Not the complete team.

18 Q. In 1999 who consisted of the team?

19 A. Martha Feters was on that team, Mr. Bell,  
20 Linda Squier, Kathleen, myself and there were members  
21 in the Philadelphia office.

22 Q. When you say, "members in the Philadelphia  
23 office," do you know who they were?

24 A. As I remember at this time, Kristy Hunt, Cindy



WILCOX & FETZER LTD.  
Registered Professional Reporters

1 Chambliss, Marion -- I don't remember Marion's last  
2 name at this time. And I don't recall who else at  
3 that time.

4 Q. Martha Feters, what was her title around the  
5 1999 time frame?

6 A. To the best of my recollection, Martha was an  
7 investment officer.

8 Q. Kristy Hunt, do you remember what her title was  
9 around the 1999 time frame?

10 A. As I recall, she was an investment officer.

11 Q. And Cindy Chambliss?

12 A. Was assistant to Brendan Gilmore.

13 Q. And Marion?

14 A. Was a portfolio administrator.

15 Q. Now, you held the position of portfolio  
16 administrator from approximately 1999 to 2003, so I  
17 would take it that during that time the composition of  
18 the groups changed, people leaving, people coming in.  
19 Is that fair to say?

20 A. Yes.

21 Q. Over a four-year period.

22 Turning to just the period of time that  
23 you held the title of portfolio administrator, did you  
24 report -- my question is broad. It's from 1999 to



1 2003.

2 Did you always report to Brendan Gilmore?

3 A. He was the team leader.

4 Q. And did you have a direct reporting  
5 relationship with him?

6 A. No.

7 Q. Now, just drawing your attention to the period  
8 of time that you held the portfolio administrator  
9 position, who did you report to? If you want to start  
10 by 1999.

11 A. Linda Squier, Martha Feters, William Becker  
12 and Greg Landis, to the best of my recollection.

13 Q. In 1999 what was William Becker's title?

14 A. As I remember, he was a vice president and an  
15 investment officer.

16 Q. And Greg Landis?

17 A. Vice president - trust officer.

18 Q. Now, and these were the four individuals that  
19 you had direct reporting obligations to, Linda,  
20 Martha, William and Greg, in 1999?

21 A. Not all at the same time.

22 Q. When you say, "Not all at the same time," what  
23 do you mean?

24 A. You said in 1999?



WILCOX & FETZER LTD.  
Registered Professional Reporters

1 Q. And would he give you assignments for the  
2 entire group or assignments for him? By that I mean  
3 did he have a set group of clients that he worked for  
4 and you, in turn, worked for those clients or were you  
5 doing work for the entire group?

6 A. Predominantly I reported to Mr. Becker and the  
7 portfolio of clients that we were responsible for  
8 and...

9 Q. And how long did you report to William Becker?

10 A. To the best of my memory, for as long as  
11 William Becker was the senior officer in Delaware  
12 until he transferred to Philadelphia.

13 Q. Do you remember when he transferred?

14 A. As best I remember, Mr. Becker left the  
15 Delaware offices and did work in Philadelphia about  
16 between 2001 and 2002.

17 Q. When William Becker transferred to the  
18 Philadelphia office, is that the point in time that  
19 you started reporting to Greg Landis?

20 A. Reporting? How do you mean "reporting"?

21 Q. Reporting in the same sense of what you were  
22 doing with William Becker, taking on or working with  
23 his portfolio of clients.

24 A. Not exclusively to Greg Landis.





1 Q. And who were the other people?

2 A. While Mr. Becker was in Philadelphia, there was  
3 still reporting to him and jointly with Greg Landis  
4 and supporting the team.

5 Q. And that was around approximately the 2001-2002  
6 time frame?

7 A. What was approximately?

8 Q. That your reporting was to Greg Landis, William  
9 Becker and to the team?

10 A. To the best of my memory, yes.

11 Q. Around 2001-2002 who -- when you say the team,  
12 who consisted of the team?

13 A. The team meaning?

14 Q. Your term the team.

15 A. The team, the Delaware team. It was headed by  
16 Brendan Gilmore. Cindy, Cindy Chambliss was his  
17 assistant. As best I recall, William Becker was still  
18 an investment officer. Marion, her last name I don't  
19 recall.

20 Q. She was still in Philly?

21 A. Marion was in Philadelphia. Bruce Holmquist  
22 was the investment officer in the D.C. area as part of  
23 the Delaware team. Until her release, Kathleen Agne  
24 was part of the team. I was part of the team. And at



WILCOX & FETZER LTD.  
Registered Professional Reporters

1 some point Maria Dunlop became part of the team.

2 Q. Now, around the 2001-2002 time frame you just  
3 described what you recall as being the Delaware team.

4 Were there other portfolio managers part  
5 of the Delaware team during 2001-2002 other than  
6 yourself? For example, like I believe you had  
7 testified at some point that Kathleen Agne was a  
8 portfolio administrator.

9 A. Administrator.

10 Q. Did I say manager?

11 A. Yes.

12 Q. I meant administrator. Agne was a portfolio  
13 administrator. Anybody else?

14 A. Myself, Marion and, as I recall, as I  
15 recollect, Dan Merlino in Philadelphia.

16 Q. You recall him to be around 2001-2002 in the  
17 Philadelphia office?

18 A. As best as I remember, yes.

19 Q. And he was a portfolio administrator, Dan  
20 Merlino?

21 A. To the best of my recollection, yes.

22 Q. And Maria Dunlop, was she a portfolio  
23 administrator?

24 A. When she was hired.



1 Q. She came in as a portfolio administrator?

2 A. Yes.

3 Q. Now, at some point Kathleen Agne was no longer  
4 working at Mellon. Is that right?

5 A. Yes.

6 Q. Do you remember when that was?

7 A. To the best of my memory, March of 2002.

8 Q. Do you remember when Maria Dunlop was hired?

9 A. To the best of my memory, July 2002.

10 Q. Was Maria hired as a result of Kathleen's  
11 departure?

12 A. I don't understand your question.

13 Q. I gather when Kathleen left you were down one  
14 portfolio administrator. It was just you in the  
15 Delaware office?

16 A. Yes.

17 Q. And was Maria hired to bring you back up to the  
18 complement of I guess two portfolio administrators in  
19 the Delaware office?

20 A. I believe that was -- I'm not sure.

21 Q. Did you ever at any point in time work  
22 physically in the Philadelphia office?

23 A. Work physically how do you mean?

24 Q. Go to the office on a meeting or work related.



1 Q. Do you remember when that was?

2 A. To the best of my memory, Mr. Bell was  
3 transferred from Delaware to Philadelphia on the  
4 Delaware team. And to the best of my memory, he left  
5 Mellon in the early two hundreds -- 2000's.

6 Q. 2000's. You said he was transferred from  
7 Delaware to Philadelphia at some point, Mr. Bell?

8 A. Yes.

9 Q. Do you remember when he was transferred?

10 A. To the best of my memory, the late 1990's.

11 Q. Do you know why he was transferred?

12 A. No.

13 Q. But after the transfer he remained a part of  
14 the Delaware team, although he was in the Philadelphia  
15 office?

16 A. Mr. Bell?

17 Q. Mr. Bell.

18 A. Yes.

19 Q. Do you know why Mr. Bell left the company?

20 A. To the best of my memory, he was forced to  
21 resign.

22 Q. And who forced him to resign?

23 A. To the best of my memory, Brendan Gilmore.

24 Q. And how do you know that Brendan Gilmore forced



1 Mr. Bell to resign?

2 A. Brendan Gilmore was the Delaware team leader.

3 Q. So are you making the assumption that because  
4 Brendan was the Delaware team leader that he had had  
5 something to do with Mr. Bell resigning?

6 A. Please repeat the question.

7 MS. WILSON: Can you repeat the question,  
8 please?

9 (The reporter read back the last  
10 question.)

11 THE WITNESS: It's not an assumption.

12 BY MS. WILSON:

13 Q. When you say it's not an assumption, how do you  
14 know?

15 A. Members of the team understood pressures  
16 Brendan Gilmore placed on Robert Bell.

17 Q. Now, did Mr. Bell ever tell you that  
18 Mr. Gilmore had forced him to resign?

19 A. I don't understand your question.

20 Q. Well, did you have any conversations with  
21 Mr. Bell in which he said, "Mr. Gilmore forced me to  
22 resign"?

23 A. To the best of my memory, Mr. Bell did not use  
24 your exact words.



WILCOX & FETZER LTD.  
Registered Professional Reporters

1 resign because of his age?

2 A. To the best of my recollection, yes.

3 Q. Why did you believe that?

4 A. I believe Brendan Gilmore wanted to eliminate  
5 older members of the team and replace them with  
6 younger people.

7 Q. Now, do you know Brendan Gilmore's age?

8 A. To the best of my memory -- do you mean at this  
9 time?

10 Q. Yes.

11 A. To the best of my memory, Brendan Gilmore would  
12 be between 55 and 58.

13 Q. Now, Ms. Blozis, you said that you feel that  
14 Brendan Gilmore wanted to eliminate older workers of  
15 the team and replace them with younger ones?

16 A. Yes.

17 Q. And that was in response to the question why do  
18 you think that Mr. Bell's forced resignation was as a  
19 result of age? Why do you say that Gilmore wanted to  
20 eliminate the older workers of the team and replace  
21 them with younger ones?

22 A. I don't understand the question.

23 Q. What do you base that on when you make the  
24 statement that Gilmore wanted to eliminate older



**WILCOX & FETZER LTD.**  
Registered Professional Reporters

1 workers of the team and replace them with younger  
2 ones?

3 A. I don't know why Brendan Gilmore wanted to  
4 replace older members. I know that he replaced  
5 Mr. Bell.

6 Correction: He put pressure on Mr. Bell  
7 to resign. He put pressure on Linda Squier to resign.  
8 He put pressure on Martha Feters to resign.

9 Q. When you say that Gilmore put pressure on Bell  
10 to resign, how do you know that?

11 A. I know that from conversations with other  
12 members of the team.

13 Q. And who were those conversations with?

14 A. Martha Feters, Linda Squier.

15 Q. And what did Martha Feters tell you?

16 A. At this time I cannot quote exactly.

17 Q. You don't have to give me the exact.

18 Abbreviated or whatever you can recall.

19 A. To the best of my recollection, Martha  
20 indicated that Brendan Gilmore was overwhelming Robert  
21 Bell with work that was unrealistic for any team  
22 officer to do at that time.

23 Q. And those were the gist of the conversations  
24 that you were having with Martha Feters about



WILCOX & FETZER LTD.  
Registered Professional Reporters

1 A. Yes.

2 Q. That was a convoluted question, but I think you  
3 understood what I meant because you had said the  
4 predominance wasn't Mr. Bell and it sounded like the  
5 predominance of the conversations that you and Martha  
6 were having had to do with other work-related issues,  
7 not having to do with Mr. Bell.

8 A. That's correct.

9 Q. Okay. But focusing on the conversations that  
10 you were having about Mr. Bell and the perception that  
11 he was being given a lot of work to do in order to  
12 force him out, that was conversation, you and Martha  
13 were having those conversations from time to time. Is  
14 that right?

15 A. Yes.

16 Q. Did you ever have any conversations with  
17 Gilmore about Mr. Bell receiving unrealistic work  
18 assignments?

19 A. To the best of my memory, no.

20 Q. Did you ever have any conversations with  
21 Mr. Gilmore about Mr. Bell's performance, job  
22 performance at any time?

23 A. It wouldn't have been something Mr. Gilmore and  
24 I would discuss.





1 Q. Do you know what job assignments Mr. Gilmore  
2 was giving Mr. Bell?

3 A. In the Mellon team structure of trust teams,  
4 Mr. Bell would have been given specific duties as a  
5 trust administrating officer.

6 Q. Do you know specifically what Gilmore was  
7 giving Mr. Bell to do?

8 A. Mr. Bell was in the Philadelphia offices, so  
9 specifically I would not know the exact job  
10 responsibilities he was getting from Mr. Gilmore.

11 Q. Do you know, did you ever have any discussions  
12 with Mr. Gilmore about the level of work that was  
13 being given to Mr. Bell?

14 A. No.

15 Q. Did you ever have any discussions with Mr. Bell  
16 about the level of work that he was being given by  
17 Mr. Gilmore?

18 A. Specifically at this time I cannot recall exact  
19 discussions with Mr. Bell.

20 Q. Now, when you say that you can't recall at this  
21 time, are you saying, Ms. Blozis, that you may have  
22 had the discussions and you don't remember sitting  
23 here today or that you didn't have the discussions?

24 A. I'm not sure I understand what you mean by the



WILCOX & FETZER LTD.  
Registered Professional Reporters

1 word "discussion."

2 Q. Conversation, talking.

3 A. At this time I don't recall specific  
4 conversations, other than when I may have seen  
5 Mr. Bell in the Philadelphia offices at team meetings  
6 and could read indications from him and see by the  
7 work on his desk how much he was given versus other  
8 officers.

9 Q. So it was by when you went to his office or at  
10 the meetings in Philadelphia, what, he seemed  
11 stressed?

12 A. Mr. Bell appeared to be stressed but had too  
13 much panache to complain to coworkers.

14 Q. And you said you would see on his desk more  
15 work than you would see on others' desks.

16 Do you remember when you said when you  
17 went to the Philadelphia office and you would see more  
18 work on his desk than others' desks?

19 A. Yes.

20 Q. Who are you comparing his I guess the height of  
21 the documents or the work?

22 A. I would have seen trust files and work and  
23 documents on Mr. Bell's desk.

24 Q. And you were comparing the size of his, the



WILCOX & FETZER LTD.  
Registered Professional Reporters